

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS**NEELIE PANOZZO, *et al.*,

Plaintiffs,

v.

RIVERSIDE HEALTHCARE; *et al.*,

Defendants.

Case No.: 2:21-cv-02292-CSB-EIL

**Plaintiffs' Motion
for Preliminary Injunction**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs move that this Court issue a preliminary injunction enjoining Defendants from terminating any of the named plaintiffs in this case currently employed by Riverside Healthcare for their non-compliance with Riverside's vaccination policy, for the reasons detailed in the accompanying memorandum of law. *See* C.D.Ill. L.R. 7.1(B)(1).

Pursuant to C.D.Ill. L.R. 7.1(A)(2), Plaintiffs request oral argument on this motion. This motion raises important questions of law directly impacting the lives of fifty-plus Riverside employees and their families. Moreover, the motion raises issues of state law which may be unfamiliar to the Court, which could use oral argument to clarify any points. Finally, the case comes to the Court with a complicated preexisting state-court record, which again could be clarified at argument.

After consulting with opposing counsel, the parties request that the Court order a response by Tuesday, December 21, and any reply by Thursday, December 23. In light of counsel's holiday travel, they ask that any hearing be scheduled for the week of January 10.

Dated: December 14, 2021

Respectfully Submitted,

NEELIE PANOZZO, ET AL.

By: /s/ Jeffrey M. Schwab
One of their attorneys

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